



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 11 2014

CERTIFIED MAIL 7010 1060 0002 1705 3399
RETURN RECEIPT REQUESTED

City of Jackson
Attn.: The Honorable Tony T. Yarber
Mayor, City Hall
219 South President Street
Jackson, Mississippi 39205

Re: Gravity Line Preventive Maintenance Program
City of Jackson, Mississippi Consent Decree
Case No.: 3:12-cv-790 TSL-JMR

Dear Mayor Yarber:

The U.S. Environmental Protection Agency Region 4 has consulted with the Mississippi Department of Environmental Quality (MDEQ) upon reviewing the City of Jackson's (the City) Gravity Line Preventive Maintenance Program dated May 30, 2014, pursuant to Section V. of the subject Consent Decree above. The EPA and the MDEQ have identified the following questions and issues needing additional clarification.

Gravity Line Preventive Maintenance Program Comments

1. Many of the resources needed to shift from a reactive to a preventive maintenance program (e.g. additional personnel on page 9; additional equipment on page 11 and the Computerized Maintenance Management System on page 13) either did not have a specific line item deadline in the Gantt chart on page 28 or were mentioned as taking longer than the 12 month full implementation requirement in the Consent Decree (e.g. hire personnel and buy equipment by 2017 and fully implement the CMMS by 2018). The EPA recognizes that the City plans to cover these resource shortfalls by outside contractors. Please explain as to whether these extra resources have already been contracted and if not, have these contracts already been budgeted for?
2. Section 3.2 (page 19): In the final paragraph of this Section, the City states that it has two employees that are already certified under the National Association of Sewer Service Companies (NASSCO) Pipeline Assessment and Certification Program (PACP) and NASSCO's Manhole Assessment and Certification Program (MACP). Does the City have plans to obtain two additional employees who are NASSCO certified in PACP and MACP so that there is a certified employee for each sewer "district," or will the current two employees divide their time between the four sewer "districts"?

3. There appears to be a typo in several locations where the City uses the acronym "ADEQ" when it is assumed the City meant to use MDEQ (Mississippi Department of Environmental Quality) (e.g. on page 13 – 4th bullet down and page 23 – bottom paragraph).

The EPA will approve the Gravity Line Preventive Maintenance Program pending a timely and complete response to the above comments. Pursuant to Section V, Paragraph 13 of the Consent Decree, please respond in writing within 30 days of receipt of this letter. If you should have any questions regarding the above comments, please contact Mr. Brad Ammons at (404) 562-9769 or via email at ammons.brad@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maurice L. Horsey, IV".

Maurice L. Horsey, IV, Chief
Municipal & Industrial Enforcement Section
Clean Water Enforcement Branch

cc: Mr. Les Herrington, P.E.
Mississippi Department of Environmental Quality

Mr. Terry Williamson
City of Jackson

Ms. Keisha Powell
City of Jackson